

Exhibit C

~~UNDER SEAL SUBJECT TO MDL AND FBI PROTECTIVE ORDERS~~

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-07853
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00117
Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450
Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914
Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617

**PLAINTIFFS' OBJECTIONS TO EVIDENCE CITED IN AL RAJHI BANK'S
AVERTMENT OF JURISDICTIONAL FACTS AND EVIDENCE AND/OR
STATEMENT OF FACTS PURSUANT TO RULE 56.1**

Pursuant the Court's Orders at ECF No. 9026 (April 17, 2023) and ECF No. 9596 (February 26, 2024), the chart below sets forth Plaintiffs' objections to evidence cited in Al Rajhi Bank's ("ARB") Averment of Jurisdictional Facts and Evidence and/or Statement of Facts Pursuant to Rule 56.1 (ECF No. 9787), ARB's Memorandum of Law (ECF No. 9786), and ARB's Response to Plaintiffs' Corrected Averment of Jurisdictional Facts & Evidence (ECF 9872). Although not specifically required, Plaintiffs also set forth objections to Plaintiffs' exhibits that ARB also seeks to introduce improperly.

The Court's Orders provide that "each party may submit, attached to a separately filed attorney declaration, a chart setting forth objections to evidence proffered or cited by an opposing party in its previous filing. Each entry on the chart should state the title of the document, the MDL docket number (and, where relevant, page or paragraph numbers), and the objection (e.g.,

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‘hearsay’).” April 17, 2023 Order 4-5. The Court further ordered that “[n]o legal argument should be included,” and the Court “will consider whether additional briefing is warranted.” *Id.* at 5. The Court’s February 26, 2024 Order granted the Parties’ joint proposal to use the same procedures set forth in the April 17, 2023 Order for “challenges to expert testimony.”

Plaintiffs object to ARB’s evidence that:

- is hearsay to which no exception applies, under Rule 802 of the Federal Rules of Evidence;
- lacks authentication, under Rule 901 of the Federal Rules of Evidence;
- is an improper summary exhibit, under Rule 1006 of the Federal Rules of Evidence;
- includes witness testimony that is not based on personal knowledge, under Rule 602 of the Federal Rules of Evidence;
- should be excluded for unfair prejudice and confusing the issue, under Rule 403 of the Federal Rules of Evidence; or,
- is expert opinion offered by a purported expert who is not qualified to offer the opinion, or whose opinion does not reflect a reliable application of the methods used to the facts of the case, under Rule 702 of the Federal Rules of Evidence.

An objection that ARB’s exhibit contains inadmissible hearsay indicates that the exhibit contains at least one level of inadmissible hearsay and that it may contain multiple levels of inadmissible hearsay. To the extent that Plaintiffs do not raise an evidentiary objection to a particular exhibit or a portion of an exhibit, that is for purposes of this motion only and is not a concession that the exhibit or portions of the exhibit contains admissible evidence. The Plaintiffs reserve the right to object to exhibits or portions of exhibits that ARB cites in support of the Bank’s Renewed Motion to Dismiss.

Likewise, ARB has made a significant number of overbroad evidentiary objections to the Plaintiffs’ Exhibits (ECF No. 9870-1 Exhibit 60). To the extent this Honorable Court endorses

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these evidentiary objections, the Plaintiffs reserve their right to object similarly to these particular categories of evidence pending the outcome of any judicial determination.

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
1	Expert Report of Aimen Dean	<p>Arb Averment – ECF #9787: ¶¶4, 44, 56, 69, 75, 91, 111, 133</p> <p>Memo of Law - ECF #9786 - p. 12</p> <p>Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 21, 70, 73, 75, 88, 95, 158, 237, 243, 248, 322, 330, 338, 408, 442, 488, 489, 499, 507, 701, 736, 740</p>	<ul style="list-style-type: none"> • Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) • Expert is not qualified to offer opinions on foreign charity branch headquarter operations or knowledge and is similarly not qualified to testify to Saudi government licensing, Bank knowledge, or knowledge of anyone associated with ARB or the ARB family, or for anyone generally supporting Al Qaeda's terrorist operations. <i>See</i> Fed. R. Evid. 702. • Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. • Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See</i> Fed. R. Evid. 802. 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			<ul style="list-style-type: none"> • Should be excluded as needless presentation of cumulative evidence. <i>See Fed. R. Evid. 403.</i> • Should be excluded under Rule 403 for unfair prejudice and confusing the issues, i.e., for discussing the knowledge of the charities, Bank, and those supporting Al Qaeda based on limited personal knowledge. <i>See Fed. R. Evid. 403.</i> 	
2	Expert Report of Fawzi Al-Hobayb	Arb Averment – ECF #9787: ¶¶2, 17, 18, 19, 20, 22, 23, 24, 25, 26, 28, 29, 31, 32, 33, 46, 58, 115, 116, 122, 127, 128, 129 Memo of Law - ECF #9786 - pp. 39, 40, 41, 42, 50 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF	<ul style="list-style-type: none"> • Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) • Expert is not qualified to offer opinion on knowledge of Bank or any of its customers in supporting terrorism, ARB's corporate organization, internal procedures and committee structure, or foreign charity operations, or Bank knowledge, or of anyone associated with ARB or the ARB family, or for anyone generally supporting Al Qaeda. <i>See Fed. R. Evid. 702.</i> 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		#9790 - p. 9, 12, 13, 15, 21, 46, 49, 50, 51, 67, 157, 159, 240, 249, 259, 271, 310, 316, 317, 319, 323, 325, 333, 335, 337, 341, 344, 349, 351, 353, 354, 357, 359, 360, 365, 366, 370, 377, 398, 411, 412, 413, 414, 415, 416, 417, 427, 431, 460, 461, 464, 465, 466, 471, 472, 494, 497, 499, 501, 504, 513, 514, 515, 520, 523, 527, 538, 550, 560, 564, 571, 578, 580, 582, 583, 593, 595, 597, 598, 599, 605, 683, 684, 689, 691, 692, 693, 699, 710, 717, 725, 738	<ul style="list-style-type: none"> Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See</i> Fed. R. Evid. 802. Should be excluded as needless presentation of cumulative evidence. <i>See</i> Fed. R. Evid. 403. Should be excluded under Rule 403 for unfair prejudice and confusing the issues, i.e., for discussing the knowledge and operation of the charities, Bank, and those supporting Al Qaeda based upon limited information and research. <i>See</i> Fed. R. Evid. 403. 	
3	Expert Report of Robert Pasley	Arb Averment – ECF #9787: ¶¶5, 16, 24, 29, 36, 37, 38, 39, 128, 129, 143, 146	<ul style="list-style-type: none"> Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Memo of Law - ECF #9786 - p. 12 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 10, 21, 31, 33, 74, 96, 126, 310, 341, 349, 351, 353, 354, 357, 359, 360, 363, 364, 365, 366, 367, 370, 378, 411, 412, 413, 414, 416, 425, 427, 431, 434, 465, 466, 504, 519, 520, 523	<ul style="list-style-type: none"> • Expert is not qualified to offer opinion on the sufficiency of Bank audits or procedures in combatting terrorist funding, Bank or donor knowledge, or that of anyone associated with ARB or the ARB family, or for anyone generally supporting Al Qaeda. <i>See Fed. R. Evid. 702.</i> • Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See Fed. R. Evid. 702.</i> • Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See Fed. R. Evid. 802.</i> • Should be excluded as needless presentation of cumulative evidence. <i>See Fed. R. Evid. 403.</i> • Should be excluded under Rule 403 for unfair prejudice and confusing issues, i.e., for discussing the knowledge of the charities, Bank, and those supporting Al 	

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			Qaeda based on limited information and research. <i>See</i> Fed. R. Evid. 403.	
4	Expert Report of Dennis Lormel	<p>¶¶7, 38, 41, 98, 108, 118, 119, 120, 121, 125, 143, 144, 145, 146</p> <p>Memo of Law - ECF #9786 - pp. 12, 45</p> <p>Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence- ECF #9790 - pp. 10, 21, 41, 48, 58, 90, 94, 123, 208, 209, 212, 214, 215, 224, 226, 233, 235, 237, 239, 246, 248, 251, 253, 267, 269, 271, 285, 286, 289, 293, 294, 296, 298, 301, 309, 312, 336, 345, 390, 437, 438, 440, 492, 546, 553, 557, 566,</p>	<ul style="list-style-type: none"> • Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) • Expert is not qualified to offer opinion on decisions relating to designations or sanction decisions involving the United States or United Nations, final determinations of FBI investigations based upon his limited personal involvement, Bank knowledge, or that of anyone associated with ARB or the ARB family, SAAR Foundation, or for anyone generally supporting Al Qaeda, or for whether CIA reports are sufficient "evidence". <i>See</i> Fed. R. Evid. 702. • Expert's opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		570, 620, 624, 672, 675, 680, 690, 705	<ul style="list-style-type: none"> • Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See Fed. R. Evid. 802.</i> • Should be excluded as needless presentation of cumulative evidence. <i>See Fed. R. Evid. 403.</i> • Should be excluded under Rule 403 for unfair prejudice and confusing the issues, i.e., for discussing his alleged investigation at the FBI when the DOJ and FBI has disavowed Lormel's purported findings, and for his failure to disclose the fact he was hired by defendants and their related principals unethically. <i>See Fed. R. Evid. 403.</i> 	
5	May 21, 1998 and Dec. 13, 1996 Ltrs. from Al Haramain KSA's KYC files	Arb Averment – ECF #9787: ¶44 Memo of Law - ECF #9786 - p. 40 Bank's Response to π's Corrected	n/a	ARB-00038774- ARB-38775

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 13, 73, 105, 158, 310, 311, 327, 344, 346, 347, 348, 350, 352, 353, 354, 355, 358, 361, 366, 380, 488, 495, 498, 502, 514, 515, 517, 519, 528, 725, 738		
6	Approval of Towayan's Request for Leave	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 648, 653, 654, 655, 656	n/a	ARB-00040369
7	May 27, 2021 FBI Electronic Comm.	Arb Averment – ECF #9787: ¶¶ 7, 119 Memo of Law - ECF #9786 - pp. 11, 34, 36	Hearsay, to which no exception applies. See Fed. R. Evid. 802. The “closing memo” EC written in contemplation of production to the parties to the MDL presents legal conclusions and prosecutorial decisions in the context of political sensitivities and practical difficulties with extradition of	EO14040-000010

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 47, 269, 285, 286, 287, 289, 291, 292, 295, 299, 340, 342, 378, 436, 438, 492, 546, 567, 570, 621, 624, 630, 631, 632, 633, 634, 636, 648, 649, 650, 651, 653, 660, 662, 663, 664, 665, 703	suspects from Saudi Arabia. It is neither trustworthy nor reliable and fails to address the facts contained in the balance of the FBI investigative reporting and evidence collected. • Should be excluded under Rule 403 for unfair prejudice and confusing the issues.	
8	Nov. 16, 2002 Ltr. from Al Rajhi Bank to SAMA	Arb Averment – ECF #9787:¶¶4, 38, 39, 92, 124 Memo of Law - ECF #9786 - p. 32 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF	• Hearsay to which no exception applies. <i>See Fed. R. Evid. 802.</i> • Lacks authentication. <i>See Fed. R. Evid. 901.</i>	ARB-00039558

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		#9790 - pp. 69, 241, 273, 406		
9	U.S. Treasury Press Release, Aug. 29, 2002 titled "The United States and Italy Designate Twenty-Five New Financiers of Terror," dated August 29, 2002	Memo of Law - ECF #9786 - p. 16	n/a	n/a
10	U.S. Treasury Press Release, Apr. 19, 2002 titled "Designation of 10 Terrorist Financiers Fact Sheet," dated April 19, 2002.	Memo of Law - ECF #9786 - p. 16 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 10	n/a	n/a
11	FBI Report	Memo of Law - ECF #9786 - p. 35 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 647, 653	• Plaintiffs have no objection to the admissibility of the document, but the Bank's characterization of its importance is wrong. Irrespective of the foregoing, the Bank's reliance on this evidence demonstrates that the Bank's own overbroad objections to such similar government reporting is incorrect.	EO14040-002135

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
12	Affidavit of Abdullah Awad Bin Laden, dated November 19, 2005	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 372, 588	<ul style="list-style-type: none"> Inadmissible hearsay to which no exception applies. <i>See</i> Fed. R. Evid 802. Should be excluded under Rule 403 for unfair prejudice for discussing the Bin Laden family connections. <i>See</i> Fed. R. Evid. 403 	n/a
13	Al Rajhi Bank 2023 Fact Sheet – from webpage titled, “Al Rajhi Bank 2023 Fact Sheet”	Arb Averment – ECF #9787: ¶12	n/a	n/a
14	Webpage titled, “Al Rajhi Bank, Company Profile Main Market,”	Arb Averment – ECF #9787: ¶¶9, 12	n/a	n/a
15	“Financial Services Report: Banks,” <i>Economist Intelligence Unit</i> August 23, 2010	Arb Averment – ECF #9787: ¶13	<ul style="list-style-type: none"> Plaintiffs have no objection to the admissibility of the document, but ARB’s characterization of its importance is mistaken. Irrespective of the foregoing, the Bank’s reliance on this evidence demonstrates that the Bank’s own overbroad objections to such similar news reports are incorrect. 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
16	2001 Al Rajhi Bank Annual Report	Arb Averment – ECF #9787: ¶¶8, 10, 15, 129 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 42, 342, 360, 365, 415, 467, 695	n/a	n/a
17	Al Rajhi Bank General Policies and Authorizations Guide	Arb Averment – ECF #9787: ¶¶18, 19, 30 and Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 51, 416, 464, 693, 710, 717	n/a	n/a
18	SAMA Circular 02419-CBL-142, July 4, 1996	Arb Averment – ECF #9787: ¶28	n/a	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
19	Al Rajhi Bank Internal Audit Plan for Fiscal Year 1999	Arb Averment – ECF #9787: ¶¶29, 30 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 51, 415, 416, 464, 693, 717, 718	• Should be excluded under Rule 403 for unfair prejudice due to the fact ARB seeks to belatedly introduce post discovery evidence of an allegedly robust internal audit process when it fully resisted the disclosure of any audit related discovery and failed to provide a full disclosure of the actual allegedly undertaken audits. <i>See</i> Fed. R. Evid. 403. Plaintiffs further reserve their right to object in this respect under grounds of ARB's unclean hands on this issue.	n/a
20	Al Rajhi Bank Internal Audit Plan for Fiscal Year 2001	Arb Averment – ECF #9787: ¶¶29, 30 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 52, 415, 417, 464, 693, 717	• Should be excluded under Rule 403 for unfair prejudice due to the fact ARB seeks to belatedly introduce post discovery evidence of an allegedly robust internal audit process when it fully resisted the disclosure of any audit related discovery and failed to provide a full disclosure of the actual allegedly undertaken audits. <i>See</i> Fed. R. Evid. 403. Plaintiffs further reserve their right to object in this respect under grounds of ARB's unclean hands on this issue.	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
21	Al Rajhi Bank Authorities of the Audit Committee Manual, June 10, 1997	Arb Averment – ECF #9787: ¶¶31, 34 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 417, 465, 694	• Should be excluded under Rule 403 for unfair prejudice due to the fact ARB seeks to belatedly introduce post discovery evidence of an allegedly robust internal audit process when it fully resisted the disclosure of any audit related discovery and failed to provide a full disclosure of the actual allegedly undertaken audits. <i>See</i> Fed. R. Evid. 403. Plaintiffs further reserve their right to object in this respect under grounds of ARB's unclean hands on this issue.	n/a
22	Banking Control Law (Royal Decree No. M/5 of June 11, 1966)	Arb Averment – ECF #9787: ¶32 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 417, 465, 693, 718	n/a	n/a
23	June 7, 1999 Ltr. from Prince of Tabuk	Arb Averment – ECF #9787: ¶44	n/a	ARB-00038699

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		and Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 73, 105, 158, 327, 344, 366, 488, 498, 514, 527, 714		
24	Jan. 4, 2004 (Hijri) Ltr. from Al Rajhi Bank Gen. Mngr. to Gov. of SAMA	Arb Averment – ECF #9787: ¶¶45, 46, 57, 58, 69, 75, 81, 87 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 72, 74, 93, 320, 328, 333, 334, 373, 390, 432, 433, 469, 471, 478, 479, 481, 608, 643, 644, 698, 699, 735, 737	n/a	ARB-00014545

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
25	Ltr. from Al Rajhi Bank Gen. Manager to Gov. of SAMA, January 26, 2003	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 93, 328, 373, 432, 433, 469, 471, 478, 479, 482, 608, 613, 643, 644	n/a	ARB-00014546
26	Mar. 13, 2004 Ltr. from Ministry of Islamic Affairs	Arb Averment – ECF #9787: ¶45 and Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 72, 321, 432, 478, 482, 698	n/a	ARB-00039505
27	Mar. 21, 2004 Ltrs. from Ministry of Justice to Al Rajhi Bank	Arb Averment – ECF #9787: ¶45 Bank's Response to π's Corrected Averment of Jurisdictional Facts	n/a	ARB-00039409

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		& Evidence - ECF #9790 - pp. 72, 321, 470, 478, 482, 698		
28	Deposition Transcript of Jonathan Winer of 1/12/24 and Errata dated 3/19/24	<p>Arb Averment – ECF #9787: ¶¶4, 5, 7, 37, 39, 40, 47, 59, 67, 73, 79, 85, 91, 92, 93, 111, 118, 121</p> <p>Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 9, 70, 74, 75, 104, 171, 204, 213, 224, 226, 233, 235, 238, 239, 242, 246, 251, 253, 256, 267, 271, 273, 274, 294, 302, 308, 313, 363, 367, 370, 373, 378, 406, 546, 557, 566, 570, 611, 617, 620, 621, 624, 625, 634, 637, 677, 680, 681, 687, 690, 691, 702, 705, 712,</p>	n/a	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		739, 750, 751, 752, 753		
29	MWL documents relating to the founding of IIRO in 1978 Oct. 1978 Ltr. from MWL Oct. 1978 Certificate from Ministry of Foreign Affairs	Arb Averment – ECF #9787: ¶¶56, 57 and Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 74, 75, 93, 170, 327, 328, 372, 433, 470, 479, 481, 489, 506, 607, 613, 643, 644, 699	n/a	ARB-13679- ARB-13688, ARB-13691, ARB-13696 ARB-13692 ARB-13683
30	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00000843
31	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00000845
32	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00000846

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
33	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00000848
34	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00013775
35	Osama bin Laden Stmt. of Acct.	Arb Averment – ECF #9787: ¶¶93	n/a	ARB-00013777
36	Article from Al Jazeera English, titled “Saudi Donates Billions to Charity,” dated May 15, 2011	Arb Averment – ECF #9787: ¶130	<ul style="list-style-type: none"> • Plaintiffs have no objection to the admissibility of the document, but ARB’s characterization of its importance is mistaken. Irrespective of the foregoing, the Bank’s reliance on this evidence demonstrates that the Bank’s own overbroad objections to such similar news reporting is incorrect. 	n/a
37	Article from Business Insider, titled “20 Most Generous People in the World,” dated October 12, 2015, by Emmie Martin and Tanza Loudenbeck, https://www.businessinsider.com/most-generous-people-in-the-world-2015-10	Arb Averment – ECF #9787: ¶130 Bank’s Response to π’s Corrected Averment of	<ul style="list-style-type: none"> • Plaintiffs have no objection to the admissibility of the document, but ARB’s characterization of its importance is mistaken. Irrespective of the foregoing, the Bank’s reliance on this evidence 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Jurisdictional Facts & Evidence - ECF #9790 - pp. 52, 419, 444	demonstrates that the Bank's own overbroad objections to such similar news reporting is incorrect.	
38	Jan. 26, 1994 business license in Jubail Municipality	Arb Averment – ECF #9787: ¶57 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 75, 93, 433, 471, 480, 699	n/a	ARB-00013527
39	Sept. 20, 1989 Letter from the Governor of the Asir Emirate to the Chairman of the Imam Muhammad ibn Saud Islamic University	Arb Averment – ECF #9787: ¶57 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 74, 93, 433, 471, 479, 480, 699	n/a	ARB-00037838- ARB-37839

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
40	Letters dated Nov. 18, 1989 to Dec. 16, 1989 from the Ministry of Interior in the Emirate of Asir	Arb Averment – ECF #9787: ¶57 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 74, 93, 433, 471, 479, 480, 699	n/a	ARB-00037502-ARB-37511
41	Oct. 17, 1997 Ltr. from Ministry of Islamic Affairs	Arb Averment – ECF #9787: ¶45 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 53, 72, 159, 320, 328, 329, 344, 380, 389, 432, 433, 444, 469, 470, 478, 479, 515, 697, 698	n/a	ARB-00038585
42	Jan. 29, 1997 Ltr. from Dep. Minister of Islamic Affairs	Arb Averment – ECF #9787: ¶45	n/a	ARB-00038613

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 72, 320, 433, 470, 479, 480, 698		
43	July 14, 1998 Ltr. from the Gen. Mngr. of the Eastern Province of the Ministry of Islamic Affairs	Arb Averment – ECF #9787: ¶45 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 72, 320, 432, 470, 479, 480, 698	n/a	ARB-00038741
44	April 14, 1999 Commercial Office License	Arb Averment – ECF #9787: ¶45 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF	n/a	ARB-00038837

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		#9790 - pp. 72, 320, 432, 470, 479, 480, 698		
45	U.S. Department of the Treasury's "OFAC Counter Terrorism Designation Removals," dated November 26, 2014.	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 363, 590	n/a	n/a
46	Al Rajhi Bank's Letter to Plaintiffs, dated December 17, 2021.	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 27, 648, 649, 651, 706	<ul style="list-style-type: none"> • Lack of personal knowledge. See Fed. R. Evid. 602. Further, this unsworn attorney letter cannot be used to the extent it is being introduced to support an evidentiary point. 	n/a
47	Al Rajhi Bank's Letter to Plaintiffs, dated January 14, 2022	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 27, 57, 648, 649, 651	<ul style="list-style-type: none"> • Lack of personal knowledge. See Fed. R. Evid. 602. Further, this unsworn attorney letter cannot be used to the extent it is being introduced to support an evidentiary point. 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
48	Statement of Account of Muhammad Osaimi, for the date June 22, 2002.	Improperly cited as ARB Ex. 51	n/a	n/a
49	Statement of Account of Muhammad Osaimi, for the date August 8, 2000.	Improperly cited as ARB Ex. 52	n/a	n/a
50	Deposition Transcript of Fawzi Hobayb, dated February 9, 2024, and the Errata, dated April 12, 2024	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 523	<ul style="list-style-type: none"> • Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) • Expert is not qualified to offer opinion on knowledge of Bank or any of its customers in supporting terrorism, ARB's corporate organization, internal procedures and committee structure, or foreign charity operations, or Bank knowledge, or of anyone associated with ARB or the ARB family, or for anyone generally supporting Al Qaeda. <i>See Fed. R. Evid. 702.</i> • Expert's opinion does not reflect a reliable application of the methods 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			<p>used to the facts of the case. <i>See</i> Fed. R. Evid. 702.</p> <ul style="list-style-type: none"> • Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See</i> Fed. R. Evid. 802. • Should be excluded as needless presentation of cumulative evidence. <i>See</i> Fed. R. Evid. 403. • Should be excluded under Rule 403 for unfair prejudice and confusing issues, i.e., for discussing the knowledge and operation of the charities, Bank, and those supporting Al Qaeda based upon limited information and research. <i>See</i> Fed. R. Evid. 403. 	
51	June 16, 2010 FBI Memorandum	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 248, 656, 657, 658	• Plaintiffs have no objection to the admissibility of the document, but the Bank's characterization of its importance is wrong. Irrespective of the foregoing, the Bank's reliance on this evidence demonstrates that the Bank's own overbroad objections to such	EO14040-640

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			similar government reporting are incorrect.	
52	Press Release from the U.S. Department of the Treasury, titled “Treasury Designates Director, Branches of Charity Bankrolling Al Qaida Network,” dated August 3, 2006, marked as Abdullah Al Rajhi Deposition Exhibit 28	Bank’s Response to π’s Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 656, 657, 658	n/a	n/a
53	Hobayb’s Declaration in Support of Expert Report, dated April 12, 2024.		n/a	n/a
54	Al Rajhi Bank’s Certified Translation of Plaintiffs’ Exhibit 81 “providing accurate, certified translation of so-called ‘Golden Chain’ document”	Memo of Law- ECF #9786 - p. 46 Bank’s Response to π’s Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 553, 675, 679	n/a	n/a
55	Plaintiffs’ Letter to Al Rajhi Bank, dated February 1, 2022	Bank’s Response to π’s Corrected Averment of	n/a	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Jurisdictional Facts & Evidence - ECF #9790 - p. 34		
56	Ltr. from the Gov. of Yanbu, June 1, 1999	Arb Averment – ECF #9787: ¶45 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 72, 320, 432, 470, 480, 698	n/a	ARB-00038818
57	WAMY licenses and authorizations from KSA government	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 735, 737	n/a	ARB-00014547- ARB-00014549
58	Telegram from KSA Prime Minister's Office	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 322, 330	n/a	ARB-00014554- ARG-0014556

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
59	Office of Foreign Assets Control, <i>Specially Designated Nationals and Blocked Persons List</i> , U.S. Dept. of Treas., dated May 3, 2024, https://www.treasury.gov/ofac/downloads/sdnlist.pdf	Arb Averment – ECF #9787: ¶¶61, 68, 74, 80, 86 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 31, 41, 71, 333, 586	n/a	n/a
60	Al Rajhi Bank's Objections to Plaintiffs' Corrected Averment Exhibits	Filed in Second Erb Declaration – ECF #9788	n/a	n/a
61	Deposition Transcript of Dennis Lormel, dated February 1, 2024, and the Errata, dated March 22, 2024	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 296, 298, 301	<ul style="list-style-type: none"> • Expert should be excluded to the extent report violated the disclosure rules of Federal Rule 26(a)(2)(B)(ii) • Expert is not qualified to offer opinion on decisions relating to designations or sanction decisions involving the United States or United Nations, final determinations of FBI 	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			<p>investigations based upon his limited personal involvement, Bank knowledge, or that of anyone associated with ARB or the ARB family, SAAR Foundation, or for anyone generally supporting Al Qaeda, or for whether CIA reports are sufficient “evidence”. <i>See</i> Fed. R. Evid. 702.</p> <ul style="list-style-type: none"> • Expert’s opinion does not reflect a reliable application of the methods used to the facts of the case. <i>See</i> Fed. R. Evid. 702. • Should be excluded to the extent expert testimony is used as a conduit for inadmissible hearsay. <i>See</i> Fed. R. Evid. 802. • Should be excluded as needless presentation of cumulative evidence. <i>See</i> Fed. R. Evid. 403. • Should be excluded under Rule 403 for unfair prejudice and confusing the issues, i.e., for discussing his alleged investigation at the FBI when the DOJ and FBI has disavowed Lormel’s purported 	

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			findings, and for his failure to disclose the fact he was hired by defendants unethically. <i>See</i> Fed. R. Evid. 403.	
62	Oct. 24, 2001 faxes from Al Rajhi Bank	Arb Averment – ECF #9787: ¶124	n/a	ARB-00014300- ARB-00014304
63	History of the Financial Action Task Force,” obtained from https://www.fatf-gafi.org/en/thefatf/history-of-the-fatf.html#:~:text=History%20of%20the%20FATF&text=The%20Financial%20Action%20Task%20Force,Commission%20and%20eight%20other%20countries. on May 6, 2024, marked as Jonathan Winer Deposition Exhibit 11	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 411, 427, 431	•Plaintiffs object as this Exhibit is being used to introduce supplemental expert opinion to support ARB's attorneys' legal argument.	n/a
64	Ltr. from Managing Director of Arab National Bank to SAMA Director	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 427	n/a	ARB-00039373

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
65	Oct. 7, 2001 Meeting Minutes for Banks' Self-Supervisory Committee	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 427	n/a	ARB-00039586
66	SAMA Circular 12872-MAT-120, Sept. 29, 2001	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 427	n/a	ARB-00014391
67	1995 Guidelines for Prevention of Money Laundering, and a certified English Translation of the same Certified Translation of 1995 SAMA Guidelines	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 428, 448, 459, 460	n/a	n/a
68	letter from Al Rajhi Bank to Plaintiffs, dated January 19, 2023	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 27	• Lack of personal knowledge. See Fed. R. Evid. 602. Further, this unsworn attorney letter cannot be used to the extent it is being introduced to support an evidentiary point.	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
69	Plaintiffs' Subpoena on CIA, dated October 19, 2021	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 19	n/a	n/a
70	Plaintiffs' Subpoena on FBI, dated November 5, 2021	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 20	n/a	n/a
71	letter from Plaintiffs to Al Rajhi Bank, dated December 20, 2021	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 34	n/a	n/a
72	letter from Plaintiffs to Al Rajhi Bank, dated October 18, 2022	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 34	n/a	n/a

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
73	Exec. Order No. 13,099, 63 Fed. Reg. 45,167 (Aug. 20, 1998)	Memo of Law - ECF #9786 - p. 32 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 70, 339, 372, 406	n/a	n/a
74	Wael Jelaidan's statement of active account at Al Rajhi Bank, Jan. 1, 1998-Dec. 31 2002	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 339, 342, 378	n/a	ARB-00001016- ARB-00001017
75	Wael Jelaidan's statement of dormant account at Al Rajhi Bank, Jan. 1, 1998-Dec. 31 2002	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 340, 342, 378	n/a	ARB-00001018- ARB-00001019
76	Al Rajhi Bank's fax to SAMA, October 19, 2002	Bank's Response to π's Corrected	n/a	ARB-00014524

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 340, 342, 378		
77	Letter from Al Rajhi Bank to Plaintiffs, dated February 28, 2023	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 27	• Lack of personal knowledge. See Fed. R. Evid. 602. Further, this unsworn attorney letter cannot be used to the extent it is being introduced to support an evidentiary point.	n/a
78	Jan. 26, 2003 Fax to SAMA	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 403, 405	n/a	ARB-00039724- ARB-00039727
79	Abdulaziz Al-Omari Statement of Account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of Jurisdictional Facts	n/a	ARB-00000001-4

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		& Evidence - ECF #9790 - pp. 400, 401		
80	Wael Shehri statement of account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 400	n/a	ARB-00000960- ARB-00000973 (Winer Dep. Ex. 13)
81	Saeed al Ghamdi statement of account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 400	n/a	ARB-00000850- ARB-00000855
82	Saeed al Ghamdi Statement of account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of	n/a	ARB-00000856- ARB-00000857

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Jurisdictional Facts & Evidence - ECF #9790 - p. 400		
83	Majed Moqed statement of account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 400	n/a	ARB-00000836- ARB-00000840 (Winer Dep. Ex. 13)
84	Ahmed al Ghamdi statement of account	Arb Averment – ECF #9787: ¶96 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 400	n/a	ARB-00000811- ARB-00000814
85	Abdullah Al-Misfer customer information files / account opening files	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF	n/a	ARB-00041951- ARB-00041952

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		#9790 - pp. 169, 392		
86	Muhammad Jamal Khalifa statement of accounts	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 372	n/a	ARB-00000841- ARB-00000842
87	Oct. 16, 2001 Banks' SSC meeting minutes	Arb Averment – ECF #9787: ¶28	n/a	ARB-00039402
88	Articles of Incorporation of the SANABELL, Inc., July 28, 1999	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 60, 372, 733	n/a	SANA-BELL0001
89	Written Consent of the Board of Directors	Bank's Response to π 's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 61	<ul style="list-style-type: none"> • Hearsay to which no exception applies. <i>See</i> Fed. R. Evid. 802. • Lacks authentication. <i>See</i> Fed. R. Evid. 901. • Should be excluded under Rule 403 for unfair prejudice as these are incomplete communications on the 	ARB-00039593

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
			issue being offered for by the Bank. <i>See Fed. R. Evid. 403.</i>	
90	IIRO 1998 Board Minutes	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 695	n/a	MWLIIRO-00016825
91	Transfer Request to IIRO-Senegal	Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - p. 695	n/a	MWLIIRO-00032668
92	Document marked at deposition of Abdullah Al Rajhi Deposition	Not cited	• Plaintiffs reserve the right to object once ARB advises as to how it intends to introduce this Exhibit	ARB-00038772
93	Deposition Transcript of Evan Kohlmann, dated January 11, 2024, and the Errata, dated March 18, 2024	Arb Averment – ECF #9787: ¶¶4, 5, 6, 7, 39, 40, 47, 56, 59, 61, 67, 68, 73, 79, 85, 91, 93, 95, 100, 102, 105, 106, 110, 111, 118	n/a	

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ARB Ex. No.	Document Description	Cited by ARB	Plaintiffs' Objection	BATES No.
		Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 - pp. 9, 70, 71, 74, 75, 94, 102, 104, 125, 126, 170, 171, 204, 213, 226, 233, 235, 237, 242, 246, 251, 256, 271, 273, 274, 294, 302, 308, 327, 329, 333, 363, 367, 370, 373, 377, 390, 400, 401, 402, 403, 405, 406, 611, 617, 621, 625, 634, 637, 640, 641, 677, 680, 684, 685, 686, 687, 691, 705, 713, 714, 735, 736, 737, 748, 750, 752		

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π's Ex. No.	****Additional Specific Objection by Plaintiffs as to ARB's Evidentiary Proffer with respect to Exhibits offered by the Plaintiffs	Cited by ARB	Plaintiff's Objection	BATES No.
1	September 27, 2023 Transcript of Abdullah bin Sulaiman Al Rajhi Deposition	Arb Averment – ECF #9787: ¶¶1,3,10,131-134 Memo of Law - ECF #9786 - p.10 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790, – pp 10, 48,53,226,240,251,255,267,268, 271,274,300,339,399,408 409,491,570,704,711,750,752	• Plaintiffs object to the use of this Exhibit by ARB to the extent it tries to introduce self-serving testimony as to the State of Mind of his father Sulaiman Al Rajhi, and to the extent it seeks to offer opinions as to reputation.	n/a
3	May 11, 2023 Errata Sheet from the Transcript of the Deposition of Al Rajhi Bank Rule 30(b)(6) Designee James Galloway	Arb Averment – ECF #9787: ¶¶6,15,17,20,21,22,26,28,29,32, 33,42,43,45,46,49,54,55,57,58, 62,66,102,112,124,135 Memo of Law - ECF #9786 - p.9,10,41 Bank's Response to π's Corrected Averment of Jurisdictional Facts & Evidence - ECF #9790 – pp 40, 57, 75, 76, 78, 97, 111, 117, 119, 121, 124, 125, 127, 128, 129, 133, 134, 136, 139, 142, 144, 145, 150, 151, 155, 169, 197, 318, 319, 320, 321, 322, 325, 326, 328, 329, 331, 332, 334, 336, 359, 365, 376, 377, 416, 419, 420, 421, 435, 436, 437, 448, 465, 468, 469, 473, 474, 475, 482, 483,	• Improper use of an Errata as a Sham Affidavit, preventing Plaintiffs from cross examining Mr. Galloway, as more fully set forth in Plaintiff's Memoranda of Law, Section (C)(2)	n/a

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	485, 611, 617, 647, 648, 687, 688, 689, 697, 698, 701, 721, 722, 734, 744.	
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